

MICHAEL A. BORG, ESQ.

ATTORNEY AT LAW
48 WALL STREET, 26TH FLOOR
NEW YORK, NEW YORK 10005
212 268-7222
Fax: 212 268-0287

March 19, 2008

Hon. Theodore H. Katz, USMJ
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Victor K. Soffer v. Valenti Motors, Inc.
USDC - SDNY Civil Action #08 CV 1456

Honorable Sir:

Counsel for both parties, despite coming very close to doing so, have been unable reach a settlement in connection with the above matter intend to file dispositive motions and accordingly submit the following motion schedule for your approval:

- Motion Return Date: October 30, 2008;
- Motions to be served so as to be received by the opposing party on or before October 3, 2008;
- Opposing Affidavits and Memoranda to be served so as to be received by the opposing party on or before October 20, 2008;
- Reply Affidavits and Memoranda to be served so as to be received by the opposing party on or before October 28, 2008.

As the parties did in fact come very close to reaching a settlement, plaintiff would welcome one final opportunity to reach a settlement, with the assistance of the Court.

Thank you for attention to this matter.

Respectfully submitted,

/s/

MICHAEL A. BORG

MAB/abm

cc: Peter J. Madison, Esq. (via e-mail)